



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

Re:	<u>Rose, Martha</u>
D#:	<u>MOB980633069</u>
Broak:	<u>1.3</u>
Other:	<u>EPA</u>
	<u>9-17-86</u>

078D

September 17, 1986

MEMORANDUM

SUBJECT: Response to Possible Illegal Movement of PCB-Contaminated Trailers
at the Martha Rose Chemical Facility, Holden, Missouri

FROM: *for* Jeff Weatherford *JWC*
SINV/EP&R/ENSV

TO: Charles Hensley
Chief, EP&R/ENSV

BACKGROUND

On September 6, 1986, at 1100 hours, the Emergency Planning and Response Branch (EP&R), EPA/VII, received a call concerning the possible illegal movement of flatbed trailers loaded with various machinery contaminated by polychlorinated biphenyls (PCBs). Ruben McCullers, Air and Toxics (ARTX)/Toxics and Pesticides (TOPE), has provided me with the following brief history of these trailers:

- December 1985 - EPA/TOPE inspects Martha C. Rose Chemical Company (MRC) in Holden, Missouri.
- February 1986 - EPA/TOPE issues letter of intent to revoke MRC permit.
- February 28, 1986 - MRC informs EPA/TOPE that they are going out of business.
- June 1986 - American Steel Company moves its equipment and machinery from the MRC site. Four loaded flatbed trailers were taken to property owned by Ms. Sharon Hayes.
- July 18, 1986 - EPA/TOPE sampled the various equipment and machinery located at the Hayes property. Samples were sent to the National Enforcement and Investigation Center (NEIC) for analysis.
- August 1986 - EPA/TOPE received the following sample analysis from NEIC:



40024201
SUPERFUND RECORDS

SAMPLE #	VALUE
071886285001-01	3000 UG/WIPE
-02	1400 ppm
-03	4600 ppm
-04	99 UG/SQU.CM
-05	130 ppm
-06	4.3 UG/SQU.CM
-07	2.5 UG/SQU.CM
-08	CONTROL SAMPLE- NEGATIVE

August 22, 1986 - Ruben McCullers notified Sharon Hayes, both verbally and in writing, that the trailers on her property were contaminated with PCBs and were not to be moved.

LOCATION

The Hayes' property is located approximately 2.2 miles northeast of Holden, Missouri, in Johnson County (Figure 1). A legal description of the location is SW 1/4, NE 1/4, SW 1/4, section 36, T.46N., R.28W., as shown on the Holden, Missouri, USGS 7-1/2 minute quadrangle.

RESPONSE

I responded to the call by arriving in Holden at 1430 hours, September 6, 1986. In Holden, I met with the mayor of the town, Francis Brillhart. Mayor Brillhart informed me that a Mrs. Scott had called him earlier to report the movement of trailers from the Sharon Hayes property. I then obtained Mrs. Scott's phone number and met with Dick Rodman, Holden city councilman, who accompanied me to the Scott residence. At the Scott residence, Mrs. Scott informed me of a red diesel tractor that had hooked up to, and pulled off site, a loaded flatbed trailer from the Sharon Hayes property. While I was relaying this information to Joe Joslin, Environmental Monitoring and Compliance Branch (on emergency standby phone duty), Dick Rodman reported that he had seen two men securing a loaded trailer at the Hayes property.

Joe Joslin then requested that I go on the property to talk with these men and take pictures if possible. I went on site on two separate occasions, once to talk to the men securing the trailer and once to take pictures of the three remaining trailers. I returned to the Scott residence from where I watched and noted any further activity until Jane Mason, FBI, arrived on scene. When the FBI arrived on site, I surrendered my film to them (which may have been exposed) and gave a verbal description of events.

A copy of my field notes, which outline the sequence of events, was sent to Counsel (CNSL) and is attached with this memo along with a map showing the site location.

EP&R involvement in this case can be considered closed unless further assistance is requested.

Attachments

cc: Martha Steincamp, CNSL
George Hess, EP&R

CONVILLE)
200

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

GEOLOG
ED

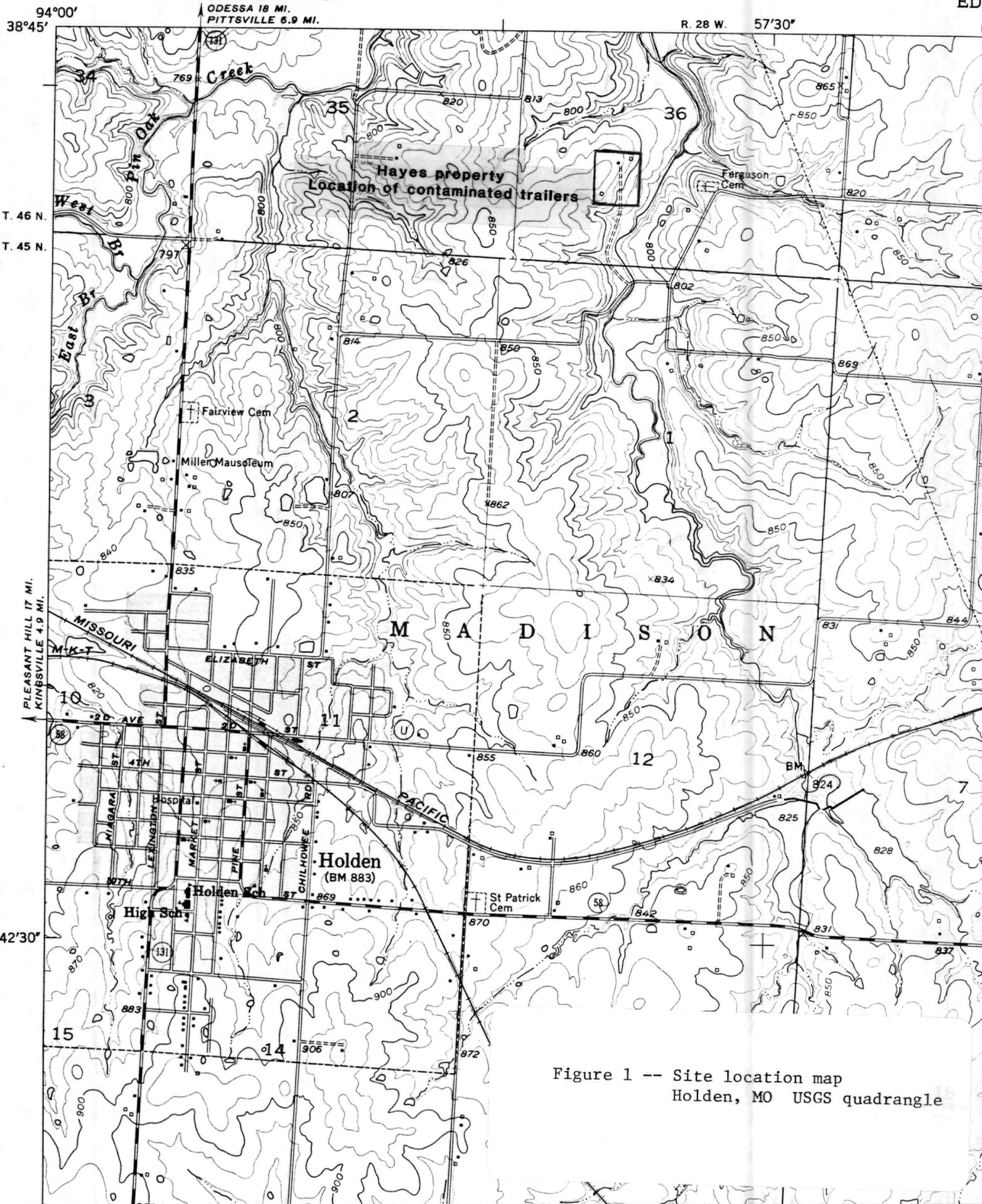


Figure 1 -- Site location map
Holden, MO USGS quadrangle

6 Sept 86

1300 - left for Holden to investigate possible illegal activity at the Hays residence, which contains contaminated steel from Martha C. Rose Chemical Company.

I was told that no steel was to be moved from this place by EPA order.

1430 - arrived Holden, MO and called Mayor Brillhart. I then met with him and he called a councilman to take me out to the place.

Mrs. Scott - placed initial call to Mayor Brillhart

816/732-6271

1500 - met Mrs. Scott

Red truck has left site with full load on flat-bed.

Jane Mason and Joan and 3rd Person
FBI - were asked to come

Plate #'s description, pictures

Gen. Mag.

Pat Parren - used to live their

Truck was bright red w/ possible gold lettering and lots of chrome

Dick Radman - said that there were two flat beds

1530 - Old red pick-up truck just left site. ~~off~~ ~~down~~

Two guys were on the property securing the load. Missoua # RL5 888 Missouri

1545 - Went on site to talk w/ people securing truck load.

They were not there when we arrived but shortly returned thereafter. I asked them the following:

question	reply
Whose property	don't know
Is this Sharon Hayes property	Yes, hers or her mothers
Are they hauling away these trucks trailers	yes, they were going to
have they hauled away one already	yes.

Q. where did they take it

A. I don't know.

Q: Whose doing the hauling

A. I don't know.

1600 - called Joe Joslin and he said ~~that~~ ^{that} FBI is on their way and for me to go on site and take pictures.

1610 - taking pictures

#16¹⁷ shows 3 trailers left looking from house ^{on site} ~~on site~~

18 - Where 1st trailer was

19 & 20 - 3 trailers from road

21 - shows house on property

22 - shows last trailer on line from hill alongside the road

23 - shows first two trailers ~~from~~ ^{from} hillside along road.1625 - ~~1625~~ ¹⁶²⁵ Blue car stopped in front of Hayes property driveway while I was taking (over)

pictures, according to Dick Rodman who was in contact w/ me by radio from Scotts house.

Dick Rodman is with the Holden City Council and has been helping me.

1432 - Dick Rodman has told me of Machinery that is in a "strip pit" outside of town. He said this machinery is from Rose and the FBI has investigated.

1435 - Summary

Four Flat bed trailers were being stored on Mrs. Hayes property. Mrs. Scott witnessed one of the Flat beds being pulled off-site.

I witnessed and took pictures of three Flatbed trailers left on site.

1450 called Rose Chemical Guard Shack
Jim Obrien, Clean Sites, Inc.

Q. Did anyone bring in any Flat bed trailers today.

A. No, nothing was brought in today.

1700 - FBI on site.

I gave them my pictures which may have been exposed when removing film. They (FBI) will take more pictures.

1750 - Left site after asking FBI if my assistance was needed. I will write a report and send it along w/ copies of my ~~8~~⁷th field notes to Martha Steincamp
EPA/CNSL

ATTACHMENT A
REGION INCIDENT NOTIFICATION REPORT

1. Case No.:

2. Reported: (mm/dd/yy) <u>09/06/86</u>		3. Time: <u>1100</u>		Recorded By: <u>J. JOSLIN</u>			
4. Through NRC: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		5. NRC Case No.: <u> </u>					
A. REPORTER	6. Reported By: <u>LEO ALDERMAN</u>						
	7. Organization Name: <u>USEPA</u>						
	8. Organization: <input type="checkbox"/> 9. responsible party <input type="checkbox"/> 10. public <input type="checkbox"/> 11. state <input type="checkbox"/> 12. local <input checked="" type="checkbox"/> 13. federal						
	14. Address: <u> </u>						
	15. City: <u> </u>		16. State: <u> </u>		17. Zip: <u> </u>		
B. DIS- CHARGER	18. Phone: <u>(816) 741-6360 HOME OFFICE EXT 2835</u>						
	19. Responsible Party: <u>ROSE CHEMICAL CO.</u>						
	20. Address: <u> </u>						
	21. City: <u>HOLDEN</u>		22. State: <u>MO</u>		23. Zip: <u> </u>		
C. INCIDENT LOCAL- TION	24. Phone: (<u> </u>)						
	<input type="checkbox"/> 25. As Above in B <input type="checkbox"/> 26. Street or Approx. Location: <u>SHARON HAYES FARM PROPERTY (PAT PERRIN RENTAL)</u>						
	27. City: <u>HOLDEN</u>		28. County: <u> </u>		29. State: <u>MO</u>		
D. DATE	30. Spill Date: (mm/dd/yy) <u> </u>				31. Spill Time: <u> </u>		
E. MATERIAL	Material: <u>PCB CONTAMINATED MATERIAL</u>		UN DOT No	CAS No.	CHRIS Code	Quantity Spilled	Units (Circle 1)
	<u>ON FLAT BED TRAILERS</u>		33.	34.	35.	36.	37. gal. oth.
			38.	39.	40.	41.	42. gal. oth.
			43.	44.	45.	46.	47. gal. oth.
			48.	49.	50.	51.	52. gal. oth.
F. SOURCE	Source of Spill: <input type="checkbox"/> 50. highway <input type="checkbox"/> 51. air <input type="checkbox"/> 52. railway <input type="checkbox"/> 53. vessel <input type="checkbox"/> 54. fixed facility <input type="checkbox"/> 55. pipeline <input type="checkbox"/> 56. offshore						
	57. Vehicle ID or Carrier No.: <u> </u>						
G. MED.	58. Description: <u>NO SPILL</u>						
	Medium Affected: <input type="checkbox"/> 59. air <input type="checkbox"/> 60. land <input type="checkbox"/> 61. water <input type="checkbox"/> 62. groundwater						
H. CAUSE	63. Waterway Affected: <u> </u>						
	Reported Cause: <input type="checkbox"/> 64. transportation accident <input type="checkbox"/> 65. equipment failure <input type="checkbox"/> 66. operational error <input type="checkbox"/> 67. natural phenomenon <input type="checkbox"/> 68. dumping <input type="checkbox"/> 69. unknown <input type="checkbox"/> 70. other						
I. DAMAGE	71. Description: <u>MAYOR OF HOLDEN REPORTS THAT UNMARKED TRUCKS ARE LOADING MATERIAL AT SHARON HAYES LOCATION</u>						
	Damages: 72. no. of injuries <u> </u> 73. no. of deaths <u> </u> 74. property damage > \$50,000 <input type="checkbox"/> yes <input type="checkbox"/> no						
J. ACT- IONS	<input type="checkbox"/> 75. Evacuation <input type="checkbox"/> 76. Response Action Taken: <u> </u>						
	<u> </u>						
K. NOTI- FIED	Caller Has Notified: <input type="checkbox"/> 77. state/local <input type="checkbox"/> 78. responsible party <input type="checkbox"/> 79. USCG <input type="checkbox"/> 80. other <input type="checkbox"/> 81. unknown						
	Agency Name: <u>STEIN CAMP, McCULLERY, ITENSLEY</u>						
L. COM- MENTS	82. Comments: <u> </u>						
	<u> </u>						
M. REGIONAL DATA FIELDS	Responding Agency: <input type="checkbox"/> state <input type="checkbox"/> local <input type="checkbox"/> responsible party <input type="checkbox"/> federal <input checked="" type="checkbox"/> EPA <input type="checkbox"/> unknown						
	Agency Name: <u>JEFF WEATHERFORD - EPA</u>						
	<u>JANE MASON - FBI</u>						
	<u> </u>						

A 3-4 Flat

Red ~~Truck~~ diesel Tractor

Pulled out 1 3 LEFT

3 others left. YELLOW BANNER
AROUND TRAILERS

Sharon Hayes (TRAILER)
rented by PAT PERRIN

Vacant House (VP USED TO LIVE
THERE)

FLAT BED COVERED WITH CANVAS

732-6271 MRS SCOTT

May be in violations
of TOSCA Regulations
BY MOVING PCB CONTAMINATED
LICENSE PLATE # MATERIAL.

Rubbin McCullers

763-2428

Send notes with Jane Mason

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9/19/86

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